

FBT-CV15-6048103-S

DONNA L. SOTO, ADMINISTRATRIX OF THE	:	SUPERIOR COURT
ESTATE OF VICTORIA L. SOTO et al.	:	
	:	JUDICIAL DISTRICT OF
Plaintiffs,	:	FAIRFIELD
	:	
v.	:	AT BRIDGEPORT
	:	
BUSHMASTER FIREARMS INTERNATIONAL,	:	December 11, 2015
LLC, et al.	:	
Defendants.	:	

DEFENDANTS CAMFOUR, INC.’S AND CAMFOUR HOLDING, INC.’S
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

Defendants Camfour, Inc. and Camfour Holding, Inc. s/h/a Camfour Holding, LLP a/k/a Camfour Holding, Inc. (collectively referred to as “Camfour”) by and through its attorneys, Renzulli Law Firm, LLP, hereby moves to dismiss plaintiffs’ First Amended Complaint against it in its entirety for lack of subject matter jurisdiction pursuant to Practice Book § 10-31(a)(1) and the Protection of Lawful Commerce in Arms Act, 15 U.S.C. § 7901, *et seq.* (“PLCAA”). Camfour also moves to dismiss plaintiffs’ claims against it for violation of the Connecticut Unfair Trade Practices Act, C.G.S. §§ 42-110a, *et seq.* (“CUTPA”) for lack of subject matter jurisdiction on the basis that plaintiffs lack standing to raise a CUTPA claim based on the allegations in the First Amended Complaint.

In support of this motion, Camfour submits the accompanying memorandum of law.

ORAL ARGUMENT REQUESTED / TESTIMONY NOT REQUIRED

WHEREFORE, Camfour respectfully requests that this Court grant its motion to dismiss plaintiffs' First Amended Complaint against it in its entirety (Counts 2, 5, 8, 11, 14, 17, 20, 23, 26, 29, and 32), and grant such other relief as it deems just and proper.

Dated: White Plains, New York
December 11, 2015

Respectfully submitted,

By: /s/ Scott C. Allan (418493)
Christopher Renzulli
crenzulli@renzullilaw.com
Scott C. Allan
sallan@renzullilaw.com
RENZULLI LAW FIRM, LLP (425626)
81 Main Street, Suite 508
White Plains, New York 10601
Telephone: (914) 285-0700
Facsimile: (914) 285-1213

Attorneys for defendants Camfour, Inc. and Camfour Holding, Inc.

ORDER

The foregoing Motion to Dismiss Plaintiffs' First Amended Complaint by Camfour having been heard by the Court, it is hereby ordered that the motion is: **GRANTED/DENIED**

THE COURT

Judge, Superior Court of Connecticut

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Dismiss was served on all counsel of record on December 11, 2015 by virtue of the State of Connecticut Judicial Branch's electronic filing system as well as by first class mail, U.S. postage prepaid to the following addresses:

Joshua D. Koskoff, Esq.
Alinor C. Sterling, Esq.
Katherine Mesner-Hage, Esq.
Koskoff Koskoff & Bieder, PC
350 Fairfield Avenue
Bridgeport, CT 06604

Attorneys for Plaintiffs

Peter M. Berry, Esq.
Berry Law LLC
107 Old Windsor Road, 2nd Floor
Bloomfield, CT 06002

Attorney for Defendants Riverview Sales, Inc.
and David LaGuercia

James B. Vogts, Esq.
Andrew A. Lothson, Esq.
Swanson, Martin & Bell, LLP
330 North Wabash, Suite 3300
Chicago, IL 60611

and

Jonathan P. Whitcomb, Esq.
Scott M. Harrington, Esq.
Diserio Martin O'Connor & Castiglioni LLP
One Atlantic Street
Stamford, CT 06901

Attorneys for Defendants Remington Arms
Company, LLC and Remington Outdoors
Company, Inc.

By: /s/ Scott C. Allan (418493)
Christopher Renzulli
crenzulli@renzullilaw.com
Scott C. Allan
sallan@renzullilaw.com
RENZULLI LAW FIRM, LLP (425626)
81 Main Street, Suite 508
White Plains, New York 10601
Telephone: (914) 285-0700
Facsimile: (914) 285-1213

Attorneys for defendants Camfour, Inc. and Camfour Holding, Inc.